> UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF TEXAS McALLEN DIVISION

United States Courts 75
Southern District of Texas
FILED
May 28, 2024

Nathan Ochsner, Clerk of Court

UNITED STATES OF AMERICA

§ 8

 $\mathbf{v}_{\boldsymbol{\cdot}}$

99

Criminal No.

M-24-785

ELIEL ABISAI ZUNIGA-ALVAREZ

T 8

INDICTMENT

THE GRAND JURY CHARGES:

Count One

On or about May 3, 2024, in the Southern District of Texas and within the jurisdiction of the Court, defendant,

ELIEL ABISAI ZUNIGA-ALVAREZ

knowingly being an alien who was illegally and unlawfully in the United States, did knowingly possess in and affecting interstate and foreign commerce, multiple firearms and ammunition, namely, a Glock, model 27 Gen 4, .40 caliber pistol; a Glock, Model 43x, 9mm caliber pistol; a SCT, P80, 9mm caliber pistol; a SCT, P80, 9mm caliber pistol; 68,040 rounds of Igman 7.62 caliber ammunition; 62,000 rounds of .223 ammunition; 10,000 rounds of 5.56 caliber ammunition; and 4,734 rounds of .50 caliber ammunition.

In violation of Title 18, United States Code, Sections 922(g)(5)(A) and 924(a)(8).

Count Two

On or about May 3, 2024, in the Southern District of Texas and within the jurisdiction of the Court, defendant,

ELIEL ABISAI ZUNIGA-ALVAREZ

did fraudulently and knowingly receive, conceal, buy, sell, or in any manner facilitate the transportation, concealment, or sale of any merchandise, article, or object, to wit: a Glock, model 27 Gen 4, .40 caliber pistol; a Glock, Model 43x, 9mm caliber pistol; a SCT, P80, 9mm caliber pistol; a SCT, P80, 9mm caliber pistol; 68,040 rounds of Igman 7.62 caliber ammunition; 62,000

rounds of .223 ammunition; 10,000 rounds of 5.56 caliber ammunition; and 4,734 rounds of .50 caliber ammunition, prior to exportation, knowing the same to be intended for exportation contrary to any law or regulation of the United States, namely, without a license or written approval from the United States Department of Commerce, as required by Title 50, United States Code, Sections 4819 and Title 15, Code of Federal Regulations, Sections 730-774.

In violation of Title 18, United States Code, Sections 554(a) and 2.

NOTICE OF FORFEITURE 19 U.S.C. § 1595a(d); 18 U.S.C. § 924(d)(1); 28 U.S.C. § 2461(c)

Pursuant to 19 U.S.C. § 1595a(d), 18 U.S.C. 924(d)(1), and 28 U.S.C. § 2461 the United States gives notice to defendant,

ELIEL ABISAI ZUNIGA-ALVAREZ

and that upon conviction of the violations listed in Counts 1 or 2 of the Indictment, all firearms and ammunition involved in said violation are subject to forfeiture, including, but not limited to, the following:

a Glock, model 27 Gen 4, .40 caliber pistol bearing serial number SNA104; a Glock, Model 43x, 9mm caliber pistol bearing serial number BWLB330; a SCT, P80, 9mm caliber pistol bearing serial number AAA0014523; a SCT, P80, 9mm caliber pistol bearing serial number AAA0014524; 68,040 rounds of Igman 7.62 caliber ammunition; 62,000 rounds of .223 ammunition; 10,000 rounds of 5.56 caliber ammunition; and 4,734 rounds of .50 caliber ammunition.

A TRUE BILL

FOREPERSON

ALAMDAR S. HAMDANI UNITED STATES ATTORNEY

ASSISTANT UNITED STATES ATTORNEY